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5
6 Counsel to the Official Committee of Unsecured Creditors

7 **IN THE UNITED STATES BANKRUPTCY COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION**
9

10 IN RE:) No. 18-31087
11 SEDGWICK LLP)
12) CHAPTER 11
13 Debtor.)
14) SECOND INTERIM
15) APPLICATION FOR
16) COMPENSATION AND
17) REIMBURSEMENT OF EXPENSES
18) OF COMMENDA ASSET
19) RESOLUTIONS PARTNERS, LLC
20)
21) Hearing Date:
22) Date: September 5, 2019
23) Time: 10:00 a.m.
24) Place: United States Bankruptcy Court
25	450 Golden Gate Ave, 16 th
26	Floor
27	Courtroom 19
28	San Francisco, California 94102
	Judge: Honorable Hanna L.
	Blumenstiel

24 Commenda Asset Resolution Partners, LLC (“**Commenda**” or “**Applicant**”), solely
25 in its capacity as Financial Advisor to the Official Committee of Unsecured Creditors (the
26 “**Committee**”), hereby submits this *Second Interim Application for Compensation and*
27 *Reimbursement of Expenses of Commenda Asset Resolution Partners, LLC* (the
28 “**Application**”) in connection with the services that it has rendered as Applicant.

1 The Application seeks approval of fees pursuant to §§ 330 and 331 of the United
2 States Bankruptcy Code, 11 U.S.C. §§ 101 et seq. (the “**Bankruptcy Code**”) and Rule 2016
3 of the Federal Rules of Bankruptcy Procedure, for an order allowing the Applicant’s fees in
4 the amount of \$103,238.33 and reimbursement of expenses in the amount of \$2,664.92 for
5 a total of \$105,903.25 for the period from March 1, 2019 through July 31, 2019 (the
6 “**Application Period**”).

7 **I. BACKGROUND**

8 On October 2, 2018 (the “**Petition Date**”), the Debtor filed a voluntary petition for
9 relief under chapter 11 of the Bankruptcy Code. The Debtor continues to manage its assets
10 and operate its business as a debtor-in-possession pursuant to sections 1107(a) and 1108 of
11 the Bankruptcy Code. No request has been made for the appointment of a trustee or
12 examiner.

13 On October 10, 2018, the Office of the United States Trustee (“**U.S. Trustee**”)
14 appointed the Committee [Docket No. 37]. The members of the Committee are: (i) BMO
15 Harris Bank, (ii) CPF 801 Tower LLC, and (iii) One North Wacker Drive LLC.

16 The Committee conducted a telephonic meeting on October 17, 2018, at which all
17 members were present and appointed Kelly Kinnon of CPF 801 Tower LLC as Chairman.
18 On October 29, 2018, the committee conducted interviews of prospective financial advisors
19 and selected Commenda as its proposed financial advisor.

20 On April 4, 2019 and April 22, 2019, the Court entered its Initial Order and
21 Supplemental Order, respectively, on the *First Interim Application for Compensation and*
22 *Reimbursement of Expenses of Commenda Asset Resolution Partners, LLC* in which it
23 awarded \$138,725.56 in fees and \$1,936.26 in reimbursement for expenses for a total of
24 \$140,661.82, on an interim basis. Commenda received payment of \$140,661.82 from the
25 Debtor.

26 **II. EMPLOYMENT OF COMMENDA ASSET RESOLUTION PARTNERS**

27 Commenda is a national financial consulting firm that provides financial advisory
28 services to companies and professionals in financial distress. Commenda has extensive

1 knowledge of insolvency, including those involving bankruptcy and state court proceedings.
2 On March 4, 2019, the Court entered its Order Authorizing Employment of Commenda
3 Asset Resolution Partners, as Financial Advisor for the Official Committee of Unsecured
4 Creditors.

5
6 **III. COMPENSATION REQUESTED AND BREAKDOWN BY PROFESSIONAL**

7 The total compensation sought in this Application is set forth below:

8 Financial Advisor's Fees (see Exhibit A)	\$103,238.33
9 Costs (see Exhibit B)	\$2,664.92
Total Compensation Requested	\$105,903.25

10
11 For this engagement, Commenda agreed to base its fees on hourly rates. The billing
12 rates that Commenda charged for services rendered are considered reasonable for this
13 jurisdiction. The following chart provides (i) a list of Commenda employees who have
14 worked on this matter, (ii) the respective employee's billing rate, (iii) the amount of time
15 each employee worked on this matter, and (iv) the total amount billed:

17 Name	Time (hours)	Cost (per hour)	Total
18 James Gansman	69.00	\$427.50	\$29,497.50
19 Michael Hayes	133.73	\$427.50	\$57,169.58
Chris Peirce	49.10	\$337.50	\$16,571.25
20 TOTAL	251.83		\$103,238.33

21
22 **IV. TERMS OF ENGAGEMENT**

23 **A. PRECLUSION OF OTHER EMPLOYMENT**

24 The financial advisory services performed were reasonable and necessary, and the
25 time and resources Commenda expended could have been utilized for other matters.
26
27
28

1 **B. EXPERIENCE, REPUTATION AND ABILITY OF APPLICANT**

2 James Gansman, Chris Peirce and Mike Hayes are all professionals with Commenda
3 and they utilized their collective experience to assist the Committee in maximizing the
4 bankruptcy estate by investigating distributions made pre-bankruptcy for potential claw-
5 back liability and analyzing other actions of the Debtor, including monitoring the collections
6 of accounts receivable and settling contingent fee matters.

7 **C. NO AGREEMENT**

8 No agreement exists between Commenda and any other person other than members
9 of the firm for sharing of compensation received from services rendered in this case,

10 **V. DESCRIPTION OF SUMMARY OF SERVICES PROVIDED**

11 Commenda was engaged by the Committee to assist with financial analysis of the
12 Debtor and specifically, to assist in the determination of a date of insolvency of the Debtor
13 and identify any “clawback liability” against its former partners. The engagement has
14 included the above activities as well as focusing on examining the Debtor’s work-in-process
15 and accounts receivable and collection of the same. There has been a recent investigation
16 and analysis of assumptions surrounding the Debtor’s (DSI’s) calculation of its reasonably
17 equivalent value defenses and overhead. Further, Commenda has been working with the
18 Committee and the Debtor on possible settlement scenarios, including participating in
19 mediation. Recently, the Debtor filed a plan and Commenda is working with the Committee
20 in analyzing said plan.

21 Commenda’s tasks to date consisted of: (i) designing plan of needed documents and
22 requesting and reviewing said documents; (ii) review of Debtor’s analysis and reports; (iii)
23 preparation of analysis and report; and (iv) formulation of settlement proposal. The detail is
24 set forth below.

25 **A. DESIGNING PLAN OF NEEDED DOCUMENTS, REQUESTING**
26 **AND REVIEWING DOCUMENTS**

27 Commenda reviewed the bankruptcy case file and assorted media reports to gain an
28 understanding of the closing of Sedgwick, LLP and the eventual bankruptcy filing. From

1 this review and initial conversations with the Committee, Commenda drafted a schedule of
2 documents needed to determine the date of insolvency of the Debtor as well as the potential
3 claw-back liability. The documents have been sent on a piecemeal basis by the Debtor and
4 in some cases, multiple requests have been made for the documents.

5 The documents and have been indexed and closely reviewed by the Commenda team.
6 Most of this work occurred in November and December 2017 but is still continuing.

7 **TOTAL HOURS 1.1 FEES \$398.25**

8 **B. REVIEW OF DEBTOR'S ANALYSIS/REPORTS**

9
10 On December 17, 2018, Commenda received Debtor's analysis. On that day, a
11 meeting was held with the Debtor, DSI, the Committee and Commenda to discuss Debtor's
12 analysis. Commenda used the analysis for raw data that it did not previously have, but also
13 to understand the Debtor's position. Most of this work occurred in November and December
14 2017 but is still continuing.

15 **TOTAL HOURS 1.37 FEES \$585.68**

16 **C. PREPARATION OF COMMENDA ANALYSIS AND REPORT**

17 Commenda delivered its draft report outlining the Debtor's insolvency date to the
18 Committee and shared the same with the Debtor. The report sets forth Commenda's
19 reasoning in determining an insolvency date. This was reviewed and updated over the last
20 few months.

21 **TOTAL HOURS 1.5 FEES \$641.25**

22
23 **D. PREPARATION OF INSOLVENCY DATE ANALYSIS**

24 In December 2017, the Committee refined its analysis of the insolvency date as
25 information continued to become available to it. The determination of the insolvency date
26 is critical to the clawback analysis of the liability of former partners. This was reviewed and
27 updated over the last few months.
28

1 **TOTAL HOURS 1.35 FEES \$577.12**

2 **E. BUILD CLAWBACK ANALYSIS MODEL BY DATE AND**
3 **PARTNER**

4 Commenda designed and built a clawback model and shared the model with not only
5 the Creditor's Committee, but the Dissolution Committee as well. By sharing this
6 information and allowing all parties see the various financial upside and downside to their
7 positions, it is hopeful a reasonable settlement can be reached. Regardless, the information
8 is available for all parties to analyze and will be useful in mediation or litigation.
9

10 **TOTAL HOURS 51.80 FEES \$20,749.50**

11 **F. PREPARATION FOR AND PARTICIPATION IN SETTLEMENT**
12 **DISCUSSIONS**

13 Beginning in December 2017, the Creditor's Committee involved Commenda in
14 attempting to reach a resolution with the Debtor, the Dissolution Committee and the former
15 partners in reaching a resolution to the claw-back liability issue. Commenda has been
16 instrumental and creative in furtherance of this goal. The settlement process has included
17 sharing of information and strategies of which Commenda has been a major contributor.
18 These efforts are continuing.
19

20 **TOTAL HOURS 66.17 FEES \$27,639.68**

21 **G. ANALYSIS OF STORAGE COMPANY EXPENSES**

22 The Creditor's Committee requested that Commenda review the proposed settlement
23 with GRM and participate in discussions to determine if there were any other viable
24 alternatives. Commenda reviewed the proposed settlement agreement and conferred with
25 the Creditor's Committee and discussed possible other alternatives.
26
27
28

1 **TOTAL HOURS 2.97 FEES \$1,269.68**

2
3 **H. REVIEW OF ISSUES RELATED TO EXTENSION OF EXCLUSIVITY**
4 **PERIOD AND PLAN CONFIRMATION**

5 Commenda spent time conferring with the Creditor's Committee on the Debtor's
6 motion to extend exclusivity as well as the alternatives for the parties, including
7 conformation of a plan or case conversion.
8

9 **TOTAL HOURS 8.87 FEES \$3,710.92**

10 **I. REVIEW OF INSURANCE POLICIES**

11 Commenda did not spend time reviewing and analyzing the Debtor's insurance
12 policies during the period covered by this fee application of March 2019 – July 2019.
13

14 **TOTAL HOURS 0 FEES \$0**

15
16 **J. ANALYSIS OF COLLECTION OF ACCOUNTS RECEIVABLE**

17 Commenda spent time reviewing and analyzing the Debtor's accounts receivable
18 collection process. The write-off of accounts receivable and the involvement of the former
19 partners in the process is important to the Creditor's Committee and may be relevant in
20 settlement discussions and/or a final proposed plan. Commenda continues to be heavily
21 involved in the monitoring of collections of accounts receivable, including contingency
22 matters.
23

24
25 **TOTAL HOURS 13.60 FEES \$5,787.00**

26 **K. REVIEW OF MONTHLY OPERATING REPORTS**

27 Commenda continues to review and analyze the Debtor's monthly operating reports.
28

1 **TOTAL HOURS 1.17 FEES \$500.18**

2
3 **L. PREPARATION FOR MEDIATION AND ATTENDANCE AT**
4 **MEDIATION**

5 The Debtor and the Committee recently agreed to engage the services of an
6 experienced mediator to resolve its differences. Commenda spent time much time providing
7 data, analysis and feedback to the mediator, Committee and the Committee's new counsel.
8 Commenda was an integral part of the preparation for mediation as well as the actual
9 mediation. Commenda's staff attended and actively participated in the mediation.
10

11 **TOTAL HOURS 52.66 FEES \$21,270.15**

12
13 **M. PREPARATION OF FEE APPLICATION**

14 Commenda spent time preparing its First Interim Fee Application and this one, the
15 Second Interim Fee Application. Commenda believes it adhered to this Court's rules and
16 spent 3.97% of its total fees sought ($\$9,627.50 / (\$138,725.56 + \$103,238.33)$) preparing the
17 two fee applications.
18

19 **TOTAL HOURS 24.50 FEES \$9,627.50**

20
21 **N. REVIEW OF 9019 SETTLEMENT MOTION**

22 Commenda spent time reviewing and analyzing the Debtor's 9019 settlement
23 motion.
24

25 **TOTAL HOURS 15.76 FEES \$6,629.40**

1 **O. REVIEW OF REV AND OVERHEAD**

2 Commenda spent time reviewing and analyzing the Debtor's calculation of its
3 reasonably equivalent value and overhead numbers per partner. Commenda has discussed
4 said numbers with the Debtor and determined its own calculations based on the Debtor's
5 own data. Commenda's calculations, if used, would increase the claims against each partner
6 and increase the size of the estate.
7

8 **TOTAL HOURS 1.01 FEES \$431.78**
9

10 **P. REVIEW OF DEBTOR'S PLAN**

11 Commenda spent time reviewing and analyzing the Debtor's Plan.
12

13 **TOTAL HOURS 8.00 FEES \$3,420.00**
14

15
16 **D. TOTAL REQUEST**

17 Based upon the foregoing, Applicant seeks payment of fees totaling \$103,238.33,
18 plus reimbursement of expenses in the amount of \$2,664.92 for total interim compensation
19 of \$105,903.25.
20

21 **E. PAYMENTS TO DATE**

22 Commenda previously received payments of \$140,661.82 for its First Interim Fee
23 Application.

24 **F. AVAILABLE FUNDS**

25 Commenda believes that the Debtor currently has sufficient funds available for the
26 payment of fees and expenses in connection with this Application.
27


28 **VI. CONCLUSION**

1 Giving consideration to the nature of the services rendered, the size of the case, the
2 legal and complexities encountered, the results achieved, and the time devoted by the
3 Applicant, the Applicant respectfully submits that the fees and expenses for which
4 compensation and reimbursement are sought in the Application are actual, reasonable and
5 necessary costs of the administration of this chapter 11 case.

WHEREFORE, the Applicant respectfully requests that this Court enter an order: (a) allowing interim compensation for Applicant in the amount of \$103,238.33 of fees and \$2,664.92. of out of pocket costs incurred from March 1, 2019 through and including July 31, 2019; and (b) authorizing and directing the Debtor to pay said amounts.

Dated: August 13, 2019

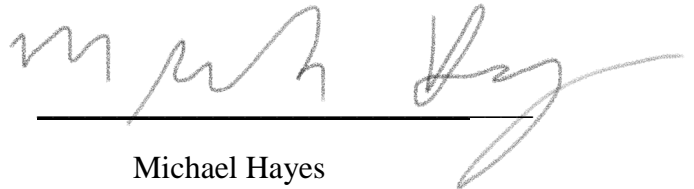
By Michael Hayes
Michael Hayes
Managing Director
Commenda Asset Resolution Partners, LLC



**DECLARATION OF MICHAEL HAYES, MANAGING DIRECTOR OF COMMENDA
ASSET RESOLUTION PARTNERS, LLC**

1. I am a Managing Director of Commenda Assets Resolution Partners (“Commenda”), financial advisor to the Committee of Unsecured Creditors in the above-captioned case.
2. Commenda was employed pursuant to order of this Court on March 4, 2019.
3. The compensation and expense requested in this Application were billed at rates no less favorable than those customarily billed by Commenda and generally accepted by Commenda’s clients.
4. I believe the Debtor has adequate funds on hand to pay the amount of \$105,903.25 which is the amount sought and supported by this Declaration.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this supplemental declaration was executed in Chicago, Illinois on August 14, 2019.



Michael Hayes

EXHIBIT A

FINANCIAL ADVISOR'S FEES BY CATEGORY

A. DESIGNING PLAN OF NEEDED DOCUMENTS, REQUESTING AND REVIEWING DOCUMENTS

Date	Hours	First Name	Last Name	Notes
6/11/19	0.80	Chris	Peirce	Review and compile list of items requested but not received from debtor
6/18/19	0.30	James	Gansman	Call w/ Sean Southard regarding his pitch to represent the committee to sue partners

B. REVIEW OF DEBTOR'S ANALYSIS/REPORTS

Date	Hours	First Name	Last Name	Notes
5/6/19	0.17	Mike	Hayes	Discuss Debtor's reports with Chris Peirce
6/18/19	1.20	James	Gansman	Review of Debtors Plan of reorganization filed with court

C. PREPARATION OF COMMENDA ANALYSIS AND REPORT

Date	Hours	First Name	Last Name	Notes
3/1/19	1.50	Mike	Hayes	Review updated model sent by Chris Peirce

D. PREPARATION OF INSOLVENCY DATE ANALYSIS

Date	Hours	First Name	Last Name	Notes
3/20/19	0.17	Mike	Hayes	Review email from Kelly Kinnon re: data from Debtor re: insolvency dates and response of Chris Peirce.
3/20/19	0.17	Mike	Hayes	Review email from Chris Peirce forwarding insolvency data information from DSI.
3/22/19	0.17	Mike	Hayes	Emails from Kelly Kinnon and Liz Green re: requesting insolvency date info from Kelly Everett.
3/22/19	0.33	Mike	Hayes	Send email to Committee re: requesting insolvency date information from DSI.
3/23/19	0.17	Mike	Hayes	Email to Kyle Everett re: Debtor's analysis on insolvency date.
3/23/19	0.17	Mike	Hayes	Review Liz Green's email to John Lucas re: insolvency date.
5/6/19	0.17	Mike	Hayes	Email to John Lucas re: his theory of the insolvency dates.

E. DESIGN AND BUILD CLAWBACK ANALYSIS MODEL BY DATE AND PARTNER

Date	Hours	First Name	Last Name	Notes
3/1/19	0.40	Chris	Peirce	Call with Mike Hayes to discuss AR credit for clawback as well as clawback scenarios in model
3/1/19	1.00	Chris	Peirce	Add AR credit functionality to clawback model as well as non-equity partners, retirees and AR to recovery scenarios.
3/1/19	0.33	Mike	Hayes	Review 2 emails sent by Chris Peirce re: updated model.
3/2/19	1.00	Mike	Hayes	Review of retiree clawback information pertaining to retirees.
3/3/19	0.30	Chris	Peirce	Call with Mike Hayes to discuss clawback model REV assumptions

1	3/3/19	2.00	Chris	Peirce	Review and revise clawback model REV calculations and add cash on hand
	3/3/19	0.10	Chris	Peirce	Call with Mike Hayes to discuss clawback model write up to committee
2	3/3/19	3.50	Mike	Hayes	Create different settlement scenarios based on different REV defences.
	3/3/19	1.00	Mike	Hayes	Research different REV scenarios based on dates of service.
3	3/4/19	0.80	James	Gansman	Call w Committee, Alan Feld and Mike regarding our deliverable on clawbacks
4					from partners and Debtor motion to pay vendor of client records. Follow up call
					with Kelly re same
	3/7/19	1.50	Mike	Hayes	Review Clawback/Settlement Analysis to see if any further way to separate
5					claims.
	3/10/19	2.50	Chris	Peirce	Format Sedgwick model for printing detail and summary to .pdf and send to
6					Mike Hayes and Jim Gansman
	3/13/19	0.30	Chris	Peirce	Add 3/31/17 insolvency detail for both REV calculations, create .pdf, and send
7					along with full model to John Lucas, Kyle Everitt, Mike Hayes, and Jim Gansman
	3/14/19	0.30	Chris	Peirce	Telephone call with John Lucas, Jim Gansman, and Mike Hayes to discuss
8					settlement model
	5/1/19	0.83	Mike	Hayes	Telephone conference with Mick Lauter explaining Commenda's theory of the
					case and insolvency date conclusions and clawback analysis.
9	5/2/19	0.33	Mike	Hayes	Sent 2 emails to Mick Lauter with copies of Commenda's analysis.
	5/5/19	0.33	Mike	Hayes	Tel call with Chris Peirce re: Clawback Analysis
10	5/6/19	0.17	Mike	Hayes	Email to Commenda team re: liability of other partners beyond core 66.
	5/6/19	6.00	Mike	Hayes	Review of DSI's original emails and Commenda's clawback analysis re: liability
11					of partners beyond core 66.
	5/7/19	4.00	Mike	Hayes	Continue to review additional partner liability beyond core 66.
12	5/27/19	4.00	Mike	Hayes	Review the REV and OH data provided by DSI, compare to the actual 2017
					expenses and begin re: working the REV and OH numbers, per partner.
13	5/28/19	5.50	Mike	Hayes	Continued work on the REV-OH numbers provided by DSI.
	5/29/19	0.50	Mike	Hayes	Review of email from Kelly Kinnon re: total amount of claims.
14	5/29/19	0.17	Mike	Hayes	Review of email from Mick Lauter re: total claims
	6/6/19	0.17	Mike	Hayes	Email to Chris Peirce re: need to revise clawback model.
15	6/11/19	0.70	Chris	Peirce	Create clawback analysis showing exposure for members of dissolution
					committee
16	6/11/19	0.80	Chris	Peirce	Call with Mike Lauter, Alan Feld, and Mike Hayes regarding Dissolution
					Committee clawback, REV/overhead calculation, and discovery requested
	6/11/19	2.50	Chris	Peirce	Create clawback analysis for income distributions of non-equity partners
17	6/11/19	0.17	Mike	Hayes	Email from Mick Lauter re: requesting meeting on Clawback Analysis and reply
					to the same.
18	6/12/19	1.60	Chris	Peirce	Create clawback summary with non-equity partners included and 3 different
					levels of REV based on overhead assumptions
19	6/12/19	0.20	Chris	Peirce	Call with Mike Hayes to discuss new REV analysis assumptions
	6/13/19	0.20	Chris	Peirce	Call with Mike Hayes to discuss overhead calculation
20	6/13/19	1.50	Chris	Peirce	Create analysis of Sedgwick partner overhead liability as part of REV
					calculation
21	6/29/19	6.00	Mike	Hayes	Prepare OH analysis based on the actual 2017 expenses if Borrower
	7/13/19	1.10	Chris	Peirce	Analysis of settlement scenarios split between NJ, Dallas, and other
22					non-settling partners based on settled partner amount and %

F. PREPARATION FOR AND PARTICIPATION IN SETTLEMENT DISCUSSIONS

	Date	Hours	First Name	Last Name	Notes
25	3/4/19	0.17	Mike	Hayes	Review email from Kelly Kinnon re: conference call with Committee
26	3/4/19	0.17	Mike	Hayes	re: Debtor motion to settle.
	3/6/19	0.17	Mike	Hayes	Review email from Candice Korkis re: Committee conference call.
27	3/6/19	0.33	Mike	Hayes	Review email from Kelly Kinnon re: settlement meeting
	3/6/19	0.17	Mike	Hayes	Review email from Kelly Kinnon re: Liz Green bio
28					Review email from Cecily Dumas re: settlement meeting

1	3/10/19	4.00	James	Gansman	Review all the Clawback Models prepared by Commenda in prep for settlement meeting and review DSI's reports.
2	3/10/19	3.00	Mike	Hayes	Review all DSI models in preparation for settlement meeting.
3	3/11/19	5.30	Chris	Peirce	Call in to meeting with Debtor's counsel, creditor committee counsel, and Commenda regarding insolvency dates, clawback, and settlement scenarios
4	3/11/19	7.20	James	Gansman	Attendance at meeting in SF attended by Debtor, their advisors, Creditors Committee members, counsel and Commenda to discuss insolvency date and potential settlements. Prep for same
5	3/11/19	3.50	James	Gansman	Determine what entire proceeds could yield UCC under best case and worst case scenarios
6	3/11/19	3.00	Mike	Hayes	Review of settlement meeting results and discuss same with Chris Peirce and Jim Gansman
7	3/11/19	8.00	Mike	Hayes	Settlement meeting in San Francisco with Debtor, Debtor's Counsel, Dissolution Committee, Creditor's Committee and Counsel
8	3/15/19	0.50	Chris	Peirce	Call with John Lucas, Kyle Everett, Cecily Dumas, Elizabeth Green, Jim Gansman, and Mike Hayes to discuss debtor settlement offer
9	3/15/19	0.70	James	Gansman	Call w/ Liz, Cecily and Mike with John Lucas and Kyle Everett to hear their settlement proposal
10	3/15/19	1.17	Mike	Hayes	Follow up settlement meeting with John Lucas, Kyle Everett, Jim Gansman, Chris Peirce, Cecily Dumas and Liz Green
11	3/15/19	0.67	Mike	Hayes	Discuss results of settlement meeting with Jim Gansman
12	3/17/19	0.50	Mike	Hayes	Draft email to Committee with results of settlement conference on Friday, 3/15
13	3/18/19	0.80	James	Gansman	Call w/Kelly, Cecily, alan,Liz and Mike regarding meetings with Debtor and strategy to talk to whole committee tomorrow
14	3/18/19	0.67	Mike	Hayes	Tel conference with Committee members, counsel and Jim Gansman re: strategy going forward.
15	3/19/19	1.20	James	Gansman	Call w committee and advisors re review of meetings w debtor and strategy going forward.
16	3/19/19	1.00	Mike	Hayes	Strategy meeting with UCc and counsel re: next steps including motions to be filed, possible request for mediation and to review offer made by Debtor. Also, discussed Debtor's request to settle contingency case.
17	4/12/19	0.40	James	Gansman	Call w/ Alan Feld updating him on meeting w John Lucas Debtors counsel
18	4/15/19	0.40	James	Gansman	Call W/ Alan Feld and Kelly regarding Friday meeting w John Lucas
19	5/2/19	0.17	Mike	Hayes	Draft email to Mick Lauter re: mediation date
20	5/3/19	0.17	Mike	Hayes	Email to John Lucas confirming mediation dates
21	5/6/19	0.33	Mike	Hayes	2 emails to Kelly Kinnon re: mediation and information needed from the borrower.
22	5/29/19	0.60	James	Gansman	Call w/ Mick and John Lucas to recap mediation and discuss settlements going forward. Informed Lucas that we had Committee meeting scheduled today.
23	6/3/19	0.50	Mike	Hayes	Review email from Mick Lauter re: discussions with John Lucas re: settlement.
24	6/3/19	0.17	Mike	Hayes	Review email from Kelly Kinnon re: settlement.
25	6/5/19	1.00	Mike	Hayes	Review detailed email from Kelly Kinnon re: claims and professional fees owed in case to determine potential distributions.
26	6/18/19	0.50	James	Gansman	Call w/ John Lucas on potential settlement of case
27	6/18/19	0.90	James	Gansman	Calls w/ Mick after my phone conversation w/ John Lucas re settlement. Review and comments on draft emails to the Committee from Alan, Mick and Mike re potential settlement
28	6/18/19	0.20	Chris	Peirce	Review overhead analysis assumptions for committee
	6/18/19	0.10	Chris	Peirce	Calculate % of settled partner liability for \$2MM settlement amount
	6/18/19	0.10	Chris	Peirce	Review letter to committee from Mick Lauter regarding call with John Lucas
	6/19/19	0.60	James	Gansman	Prep for depositions review of Mick's, Chris's and Mike's emails re potential questions at depos. Comment on same
	6/20/19	0.50	James	Gansman	Prep for depos. Response to lawyers, Committee members and Commenda issues
	6/20/19	0.70	Chris	Peirce	Analyze settlement file provided by debtor, compare with clawback models already provided as well as committee settlement/clawback model, and email committee counsel opinion on debtor file

1	6/20/19	0.20	Chris	Peirce	Review emails from committee counsel regarding settlement discussion with John Lucas and subsequent response from committee members and counsel
2	6/21/19	0.10	Chris	Peirce	Review settlement and deposition summaries from Alan Feld and related discussion from committee
3	6/21/19	0.17	Mike	Hayes	Review Josh Wolfgram's email re: settlement.
4	6/24/19	0.40	James	Gansman	Review and comment on Mikes settlement email to Committee. Review of comments from Kelly and Martin
5	6/24/19	0.50	James	Gansman	Call w/ Alan to discuss depositions and Settlement discussions
6	6/24/19	0.17	Mike	Hayes	Telephone conference with Jim Gansman re: settlement.
7	6/24/19	0.33	Mike	Hayes	Draft email to UCC re: Commenda's opinion on settlement.
8	7/2/19	0.40	James	Gansman	Review of email from Mick on NJ Partners and call w Mick on update of case
9	7/12/19	0.17	Mike	Hayes	Review email from Mick Lauter re: settlement options.
10	7/12/19	0.17	Mike	Hayes	Review another email from Mick Lauter re: settlement and NJ partners.
11	7/12/19	0.33	Mike	Hayes	Review email from Mick Lauter re: NJ and Dallas partners liabilities.
12	7/12/19	0.33	Mike	Hayes	Review email from C Peirce re : NJ and Dallas partners and their liability
13	7/12/19	0.17	Mike	Hayes	Review email from Mick Lauter re: Rogeau's emails and NJ partners.
14	7/12/19	0.33	Mike	Hayes	Draft email to Mick Lauter re: NJ partners
15	7/12/19	0.17	Mike	Hayes	Draft email to Mick Lauter re: liability ranges of non-settling partners.
16	7/13/19	3.00	Mike	Hayes	Review email from Chris Peirce and detailed analysis re: NJ and Dallas partner liability.
17	7/13/19	0.17	Mike	Hayes	Draft email to Chris Peirce re: non-settling partners.
18	7/16/19	1.00	Mike	Hayes	Review email from Mick Lauter and review chart of NJ and Dallas liability with him.
19	7/25/19	0.40	James	Gansman	With John Lucas to discuss where Debtor is in negotiating w clients. Hopeful to have response on Friday or Monday.
20	7/29/19	0.30	James	Gansman	Call w/ John Lucas and Mick to review Debtor's latest settlement offer.
21	7/29/19	0.50	James	Gansman	Follow up call w/ Mick re Debtors settlement nd emails re same w advisors
22	7/29/19	0.40	James	Gansman	Review of data sent over by Debtor on new settlement proposal
23	7/29/19	0.17	Mike	Hayes	Review email from Mick Lauter re: deadline regarding settlement opportunities.
24	7/29/19	0.17	Mike	Hayes	Review email from Jim Gansman re: deadline to settle.
25	7/30/19	0.80	James	Gansman	Call with Alan, Mick and Mike to discuss settlement offer and then another call with each individually after call with John Lucas
26	7/30/19	0.40	James	Gansman	Call w/ Jon Lucas to talk settlement and ways to get to the \$2 million number. Lucas is going back to dissolution committee and will come back tomorrow
27	7/30/19	0.33	Mike	Hayes	Review email from jim Gansman re: settlement options.
28	7/30/19	0.33	Mike	Hayes	Draft email to Mick Lauter re: \$1.83MM settlement offer.
29	7/31/19	0.70	James	Gansman	Call with John Lucas re revised settlement number to 1.93 million, calls w/ Mick and Mike re same and emails re same
30	7/31/19	0.33	Mike	Hayes	Review email from Kelly Kinnon re: dates to meet with Debtor.
31	7/31/19	0.50	Mike	Hayes	Review email from Mick Lauter re: meeting dates to settle.
32	7/31/19	0.83	Mike	Hayes	Draft email to UCC re: excluding 7 partners from settlement.
33	7/31/19	0.17	Mike	Hayes	Draft email to John Lucas seeking update on A/R
34	7/31/19	0.17	Mike	Hayes	Draft email to UCC re: addition of 2 partners to settlement pool.
35	7/31/19	1.00	Mike	Hayes	Telephone call with John Lucas, Alan Feld, Mick Lauter and Jim Gansman re: settlement with and without 47 partners.
36	7/31/19	0.17	Mike	Hayes	Draft email to Mick Lauter re: agreeing with his his analysis on 4 partners.
37	7/31/19	0.33	Mike	Hayes	Draft email to Mick Lauter re: liability of non-settling partners.
38	7/31/19	0.33	Mike	Hayes	Draft email to Mick Lauter re: settlement scenarios.
39	7/31/19	0.17	Mike	Hayes	Review email from Mick Lauter re: settlement scenarios

26 G. ANALYSIS OF STORAGE COMPANY EXPENSES

27	Date	Hours	First Name	Last Name	Notes
28	3/4/19	0.50	Mike	Hayes	Telephonic call with Kelly Kinnon< Jim Gansman and Alan Feld re:

3/13/19	0.30	James	Gansman	motion to compromise filed by Debtor. Review of Kelly's email to committee regarding Monday meeting; emails regarding continuance of GRM settlement
3/27/19	0.40	James	Gansman	review of Lars motion objecting to the GRM settlement
4/3/19	1.10	James	Gansman	Attend court hearing on GRM telephonically
4/3/19	0.50	Mike	Hayes	Attend court hearing on objection to GRM Settlement
4/4/19	0.17	Mike	Hayes	Draft email to Kelly Kinnon on results of yesterday's objection to GRM settlement.

H. REVIEW OF ISSUES RELATED TO EXTENSION OF EXCLUSIVITY PERIOD AND PLAN CONFIRMATION

Date	Hours	First Name	Last Name	Notes
3/26/19	0.40	James	Gansman	review of emails from Liz re April 4 hearing and discussion w Alan Feld
4/16/19	0.50	James	Gansman	Call w/ Kelly and Alan regarding John Lucas's proposal on extending exclusivity.
4/16/19	0.40	James	Gansman	Call W/Alan regarding mediation w Debtor and exclusivity motion
4/17/19	0.20	James	Gansman	Call w/ John Lucas re filing of exclusivity motion
4/18/19	0.70	James	Gansman	Review of John Lucas email, call to Alan Feld to discuss then conference call w/Alan and John re extension of exclusivity til 5/16 and mediation dates
4/24/19	0.60	James	Gansman	Call w/ Kelly and Alan to discuss the 2 settlements and extension of exclusivity until early June
4/25/19	0.20	James	Gansman	Call w Alan Feld re calling Lucas re motion for exclusivity
4/25/19	0.30	James	Gansman	Call w/ Jon Lucas to discuss exclusivity and mediation
4/25/19	0.30	James	Gansman	review of email from Kelly to Committee on Alan's emails on Lucas filing motion to extend exclusivity
4/30/19	0.60	James	Gansman	Call w/ Mick to give overview of case to determine whether they can serve as committee counsel.
5/16/19	0.50	James	Gansman	Review of John Lucas's motion and emails with our counsel re same and strategy to deal w motion
5/17/19	0.40	James	Gansman	Call w John Lucas to discuss exclusivity period and problems with his motion
5/17/19	0.60	James	Gansman	Calls w/ Alan Feld and Mick Lauter regarding my conversation w John Lucas an strategy re same
5/17/19	0.50	James	Gansman	Review of emails and our motion presented to Committee regarding motion to extend exclusivity
5/29/19	1.00	James	Gansman	Call w/ full Creditors Committee to discuss mediation, settlement proposal, exclusivity and motion for derivative standing.
6/3/19	0.17	Mike	Hayes	Review email from Mick Lauter and Alan Feld re: derivative standing.
6/5/19	0.60	James	Gansman	Review of Committee brief objecting to exclusivity and review of changes by Committee members
6/17/19	0.90	Chris	Peirce	Review Trustee Objection, Document request of Debtor, and liquidation plan

J. ANALYSIS OF COLLECTION OF ACCOUNTS RECEIVABLE.

Date	Hours	First Name	Last Name	Notes
3/23/19	0.33	Mike	Hayes	Email to Liz Green and Kelly Kinnon re: the status of the Debtor's a/r and further action that can be taken.
3/23/19	0.17	Mike	Hayes	Review emails from Liz Green and Kelly Kinnon on a/r.
3/23/19	0.17	Mike	Hayes	Email to Liz Green suggesting 1-2 hour meeting with a/r collections firm.
3/23/19	0.17	Mike	Hayes	Draft email to Liz Green and Kelly Kinnon re: settlement of contingency case and review Liz Green's email re: the same.

1	3/26/19	0.50	James	Gansman	of Uribe contingency litigation, call w Chris and emails re same
2	3/26/19	0.30	Chris	Peirce	Call with Jim Gansman to review analysis of Maria Uribe contingency case and Richard Herman fees with both firms
3	4/2/19	1.50	Mike	Hayes	Review accounts receivable reports submitted by Debtor in preparation for tomorrow's call with A/R collection firm.
4	4/3/19	1.20	James	Gansman	Call w/George and John Lucas of Dissolution Committee and Mike re review of outstanding A/R of Sedgwick
5	4/3/19	1.50	Mike	Hayes	Telephonic conference with John Lucas and George Abodeely to discuss top 20 remaining A/R and methodology of his form in the collection process.
6	4/4/19	0.50	Mike	Hayes	Draft email to UCC on status of A/R collections and results of yesterdays meeting.
7	4/19/19	0.30	James	Gansman	Call w/ John Lucas regarding Uribe and These-Krupp settlements
8	4/19/19	0.10	James	Gansman	Emails to Kelly and Alan re settlements with These-Krupp and Uribe
9	4/19/19	0.40	James	Gansman	Phone conversation w Alan Feld re call w John Lucas on Uribe and Thysen Krupp settlements. Call w/ Mike hayes re same
10	4/23/19	0.30	James	Gansman	with John Lucas regarding Uribe and These-Krupp and mediation for 5/23
11	4/24/19	0.30	James	Gansman	Call w/ Kelly to review Uribe and These-Krupp potential settlements. Review of extension of exclusivity tied to mediation.
12	5/2/19	1.00	Mike	Hayes	Review of accounts receivable reports and forward same to Mick Lauter
13	5/4/19	1.00	Mike	Hayes	Review A/R and track responsible partners.
14	5/6/19	0.17	Mike	Hayes	Review email from John Lucas re: On-Site information.
15	5/8/19	0.40	James	Gansman	call w/Mick and John Lucas regarding Uribe settlement.
16	5/8/19	0.50	James	Gansman	Review of Micks email to committee on Uribe settlement, call w/ him re same and response to Kelly's email to Committee on Uribe
17	5/30/19	0.33	Mike	Hayes	Review of email from Mick Lauter re: cash position of Debtor and compare against previous information provided.
18	6/10/19	0.30	James	Gansman	Call with Mick and John Lucas to discuss settlement of 2 A/R claims. Gave Committee blessing on both
19	7/8/19	0.33	Mike	Hayes	Draft email to Kelly Kinnon re: status of A/R
20	7/18/19	0.83	Mike	Hayes	Review email from Kelly Kinnon re: accounts receivable.
21	7/18/19	0.83	Mike	Hayes	Review long email from Kelly Kinnon re: monies owed from UK.
22	7/18/19	0.17	Mike	Hayes	Review response email from Mick Lauter re: UK monies and a/r.

K. REVIEW OF MONTHLY OPERATING REPORTS.

Date	Hours	First Name	Last Name	Notes
3/29/19	0.50	James	Gansman	review of Feb. monthly cash flow statement filed with the court. Emails re same
6/3/19	0.17	Mike	Hayes	Review email from Kelly Kinnon re: debtor's non-payment of \$175,000.
6/3/19	0.33	Mike	Hayes	Review of email from Kelly Kinnon re: outstanding professional fees in case.
6/17/19	0.17	Mike	Hayes	Email from John Lucas re: information for MOR and reply with the same.

L. MEDIATION PREP AND ATTENDANCE

Date	Hours	First Name	Last Name	Notes
3/20/19	0.17	Mike	Hayes	Revoew email from Liz Green re: Committee information needed.
3/20/19	0.17	Mike	Hayes	Review email from Liz Green re: timing of transfers and respond back.
3/20/19	0.17	Mike	Hayes	Review email from Liz Green re: mediator choices.
3/20/19	0.17	Mike	Hayes	Review email from Alan Feld re: choices of mediator.
3/20/19	0.17	Mike	Hayes	Revoew of email from Kelly Kinnon re: mediator choices.
3/20/19	0.17	Mike	Hayes	Email from Liz Green re; issues including 2004 exam.
3/22/19	0.17	Mike	Hayes	Review email from Liz Green re: email forwarded from John Lucas re: mediators, objection to settlement claim, 2004 exam and insolvency dates

1	3/22/19	0.17	Mike	Hayes	Review email from Kelly Kinnon re: mediators and getting it done soon.
	3/22/19	0.17	Mike	Hayes	Email from Liz Green re: Judge Montali and mediation.
2	4/9/19	0.30	James	Gansman	Email correspondence w Committee and counsel regarding choosing of Arbitrator
3	4/12/19	1.20	James	Gansman	Meeting w John Lucas Debtors Counsel to discuss mediation and insolvency dates.
	4/15/19	0.70	James	Gansman	Call w/Alan Feld and John Lucas regarding mediation
4	4/15/19	0.20	James	Gansman	Follow up call with John Lucas regarding potential mediation dates w/ Cooper. May 22-23 seem to be first available
	4/23/19	0.40	James	Gansman	Call w/ Alan to discuss call with John Lucas re settlements and mediation
5	5/1/19	0.40	James	Gansman	Call w Alan Feld and John Lucas of Debtor to discuss mediation date and mediation statement
6	5/2/19	0.60	James	Gansman	Call w/ Alan and Kelly regarding change of Committee counsel, mediation and period of exclusivity.
7	5/8/19	0.30	James	Gansman	Call w/ Mick re statement for mediator
	5/9/19	0.60	James	Gansman	Call w/ Mike and Mick regarding mediation statement that needs to be drafted.
8	5/13/19	0.30	James	Gansman	Review and Comment on emails concerning the hiring of Diamond Mc Carthey as contingency counsel to go after individual plaintiffs
9	5/13/19	0.40	James	Gansman	Review of emails between Mick and Mike re insolvency date
	5/14/19	0.20	Chris	Peirce	Call with Mike Hayes to discuss mediation statement deliverables
10	5/14/19	0.40	Chris	Peirce	Review bank statements to obtain dates of letter of credit transactions
	5/14/19	0.40	Chris	Peirce	Review Sedgwick budget documents for monthly net income plan for graphs used in mediation statement
11	5/14/19	0.20	Chris	Peirce	Revise graphs showing cash balance trend, net income by month, and % of net income by office for mediation statement
12	5/14/19	0.70	Chris	Peirce	Call with Mike Hayes and Michael Lauter to discuss Sedgwick case and items needed to complete mediation statement
13	5/14/19	0.80	Chris	Peirce	Research budget data including date budget was created, revised budget plan, and revised cash collection, WIP, etc report from debtor
14	5/14/19	1.10	Chris	Peirce	Research key dates in case and build timeline graphic to illustrate history of major events
15	5/14/19	0.20	Chris	Peirce	Call with Mark Dow to discuss cash basis budget using cash collected instead of billed amount
16	5/15/19	0.60	Chris	Peirce	Review mediation statement from Michael Lauter and provide missing information including dates and amounts of prior year distributions made in 2017
17	5/16/19	0.50	Chris	Peirce	Research and provide historical cash balances by month from 2015-2017
	5/16/19	0.30	Chris	Peirce	Research and provide line of credit history from 2015-2016
18	5/16/19	0.20	Chris	Peirce	Review prior settlement scenarios from debtor to add to mediation settlement
	5/19/19	0.30	James	Gansman	Call w/ Allan to discuss John's discussion that he can settle cases (9019 motion) without Committee
19	5/20/19	0.30	James	Gansman	Call w/ Mick re 9019 issue and not getting debtor brief before mediation
20	5/20/19	0.80	James	Gansman	Call w/ Committee and counsel to prep for mediation
21	5/20/19	0.20	James	Gansman	Review of Committee Minutes shared by Mick
	5/20/19	0.33	Mike	Hayes	Email to Mick Lauter re: non-sharing of mediation statements and review of Alan Feld's email re: same.
22	5/20/19	0.17	Mike	Hayes	Review of email from Kelly Kinnon re: mediation.
23	5/20/19	1.33	Mike	Hayes	Email from Mick Lauter re: Debtor's mediation statement and review of the same.
	5/21/19	0.10	Chris	Peirce	Call with Mike Hayes to discuss settlement scenarios
24	5/21/19	1.50	Chris	Peirce	Develop settlement amounts for new scenarios
	5/21/19	0.50	Chris	Peirce	Add retiree and non-equity partners to settlement document
25	5/21/19	0.17	Mike	Hayes	Review email from Mick Lauter re: clawback Analysis.
	5/21/19	1.75	Mike	Hayes	Telephone conference with Mick Lauter and Michael Cooper re: UCC's position.
26	5/21/19	0.17	Mike	Hayes	Follow up telephone call with Mick Lauter and discussion with Michael Cooper.
27	5/21/19	0.17	Mike	Hayes	Review email from John Lucas re: a/r, fees and cash.
28	5/21/19	0.17	Mike	Hayes	Draft email to Mick Lauter and Alan Feld re: Commenda's position on liability of attorneys.

1	5/21/19	5.50	Mike	Hayes	Work with Chris Peirce in updating Clawback Analysis to include non-equity partners and retirees. Review email from Chris Peirce re: same.
2	5/22/19	2.40	James	Gansman	Review of scenarios put together by Commenda, Review of brief prepared by Debtor while on plane
3	5/22/19	0.10	Chris	Peirce	Review emails regarding settlement scenarios
	5/22/19	0.10	Chris	Peirce	Call with Mike Hayes to discuss new settlement modeling requests
	5/22/19	0.90	Chris	Peirce	Produce analysis showing original settlement scenarios without REV
4	5/22/19	0.10	Chris	Peirce	Send Michael Lauter and Mike Hayes 2016 reviewed financials with note regarding covenant non-compliance
5	5/22/19	0.17	Mike	Hayes	Review email from Kelly Kinnon re: attendance at mediation
	5/22/19	1.50	Mike	Hayes	Further review and update of Clawback Analysis
6	5/23/19	0.90	James	Gansman	Prep for mediation with Kelly Mick and Alan. Discussed scenarios prepared by Commenda
7	5/23/19	8.20	James	Gansman	Attendance at all day Mediation w Michael Cooper of Wendel Marks, Dissolution Committee, Jon Lucas, Kyle, Alan, Mick, Kelly and myself
	5/23/19	0.70	James	Gansman	Update Call w/ Committee to discuss where we stand on mediation
8	5/23/19	0.80	Chris	Peirce	Mediation call with Kelly Kinnon, Alan Feld, Michael Lauter, Jim Gansman, and Mike Hayes to review settlement scenarios
9	5/23/19	0.40	Chris	Peirce	Update clawback model to separate between partners willing to settle and unwilling to settle
10	5/23/19	0.60	Chris	Peirce	Full creditor committee call on settlement options
	5/23/19	0.40	Chris	Peirce	Call with mediator and creditor committee to discuss settlement scenarios, insolvency dates, amounts offered previously
11	5/23/19	0.70	Chris	Peirce	Research and review data regarding partner details for each scenario
	5/23/19	0.20	Chris	Peirce	Add May 31 insolvency date to settlement scenarios
12	5/23/19	4.50	Mike	Hayes	Attend mediation and side calls via conference call
	5/28/19	0.70	James	Gansman	Call w/ Mick, Alan, Mike and Chris to discuss outcome of mediation and building outcome scenarios for Committee
13	5/28/19	0.70	Chris	Peirce	Call with Mick Lauter, Alan Feld, Jim Gansman, and Mike Hayes to review mediation meeting, discuss total professional fees involved, and discuss next steps including follow up call with John Lucas and sensitivity analysis.
14	5/28/19	0.50	Mike	Hayes	Review email from Mick Lauter and Kelly Kinnon re: results of mediation.
15	5/29/19	0.20	Chris	Peirce	Send final settlement/mediation analysis to Mick Lauter, Jim Gansman, and Mike Hayes and compare with debtor's settlement amount trying to tie to an insolvency date
16	5/29/19	0.90	Chris	Peirce	Call with creditor committee to review last week's mediation meeting, discuss settlement options, and discuss next steps
17	5/29/19	1.00	Mike	Hayes	Meeting with Committee re: follow up to Mediation.

M. FEE APPLICATION PREPARATION

	Date	Hours	First Name	Last Name	Notes
20	3/1/19	5.00	Mike	Hayes	Prepare Commenda's First Interim Fee Application
21	3/4/19	5.00	Chris	Peirce	Work on fee application pulling time entries, categorizing, totaling hours and fees, and updating the fee application document
22	4/4/19	0.60	James	Gansman	Attend Telephonic court hearing on fee applications.
	4/5/19	1.50	Mike	Hayes	Prepare Supplemental Declaration in support of Fee Application.
23	6/30/19	8.00	Mike	Hayes	Prepare 2nd Interim Fee Application
	7/21/19	2.00	Chris	Peirce	List detail entries, summarize by person and task with hours and fees
24	7/25/19	0.40	Chris	Peirce	Update fee app detail and send to Mike Hayes
	7/31/19	2.00	Chris	Peirce	Prepare detail by task and person with total hours and fees and expenses

N. REVIEW 9019 SETTLEMENT MOTION

	Date	Hours	First Name	Last Name	Notes
27	6/5/19	0.33	Mike	Hayes	Review email from Mick Lauter re" Debtor's new strategy.
28	6/6/19	0.80	Chris	Peirce	Recalculate settlement scenarios with additional partners willing to

1					settle. Provide committee with debtor settlement % of total for partners willing to settle for 1/31 and 3/31 insolvency dates
2	6/6/19	0.20	Chris	Peirce	Review debtor statement regarding exclusivity, motion with former partners, and exhibits for accuracy.
3	6/6/19	0.20	Chris	Peirce	Research volume of documents provided by debtor for rebuttal to debtors claim of documents provided
4	6/6/19	0.80	James	Gansman	Phone conversations with both Mick and Alan to discuss the Debtor's 9019 motion.
5	6/6/19	0.40	James	Gansman	Review of emails by counsel, Chris's analysis and Committee members regarding Debtor 9019 motion
6	6/6/19	0.17	Mike	Hayes	Review email from Mick Lauter re: discovery needed.
6	6/6/19	0.17	Mike	Hayes	Email from Kelly Kinnon re: discovery and potential insurance claims.
7	6/7/19	1.10	James	Gansman	Review of Debtors 9019 motion
7	6/7/19	0.30	James	Gansman	Review of emails from Committee members and counsel re motion
8	6/10/19	0.40	James	Gansman	Review of emails regarding strategy relating to rebuttal of 9019 motion, conversations w/ Mike Hayes re same
8	6/10/19	0.17	Mike	Hayes	Email from Mick Lauter re: requesting Commenda put together email with evidence still needed to evaluate Debtor's motion.
9	6/10/19	0.17	Mike	Hayes	Email from Mick Lauter re: identify of three Dissolution Committee members.
10	6/11/19	0.50	James	Gansman	Review of emails regarding Discovery issues in response to 9019 motion
10	6/11/19	2.50	Mike	Hayes	Review documents requested to date from Debtor as well as items received and compile list of documents still needed from Debtor in order to fully litigate insolvency/clawback issue.
11	6/11/19	0.17	Mike	Hayes	Review email from Mick Lauter re: lease information needed
12	6/11/19	0.17	Mike	Hayes	Reply to Mick Lauter re: his email re: leases
12	6/11/19	0.50	Mike	Hayes	Draft email to Mick Lauter and Alan Feld re: additional evidence needed
13	6/12/19	0.30	James	Gansman	Emails with Alan regarding hiring of Sean Southard as contingency counsel and emails to Sean to set up meeting
14	6/12/19	0.30	James	Gansman	Conversations w Mike Hayes to discuss strategy to review DSI work product
15	6/13/19	0.60	James	Gansman	Conversations w Sean Southard about being Contingency Counsel in plan put forward by Creditor Committee
16	6/13/19	0.17	Mike	Hayes	Prepare email to Mick Lauter re: discovery needed.
16	6/14/19	1.00	James	Gansman	Interview Sean Southard by Mick, Alan and I to be contingency counsel to sue Partners
17	6/14/19	1.00	Mike	Hayes	Review email and document request list from Shadi Farzan re: discovery.
17	6/14/19	0.17	Mike	Hayes	Email to Shadi Farzan re: discovery request.
18	6/20/19	2.00	Mike	Hayes	Draft email to Erinn Contreras re: questions to ask at deposition.
18	6/21/19	0.50	Mike	Hayes	Review Alan Feld's email re: results of deposition and potential settlement.
19	7/2/19	0.17	Mike	Hayes	Review email from Mick Lauter re: communication from NJ partners.
19	7/2/19	0.50	Mike	Hayes	Review of email from Chris Peirce re: NJ partners.

20 O. REV AND OVERHEAD ANALYSIS

21	Date	Hours	First Name	Last Name	Notes
22	3/12/19	0.50	Mike	Hayes	Review REV analysis
23	6/11/19	0.17	Mike	Hayes	Review email from Chris Peirce re: overhead/REV calculations.
23	6/12/19	0.17	Mike	Hayes	Review email from Mick Lauter re: Overhead
24	6/12/19	0.17	Mike	Hayes	Email from Chris Peirce re: overhead.
24	3/12/19	0.50	Mike	Hayes	Review REV analysis
25	6/11/19	0.17	Mike	Hayes	Review email from Chris Peirce re: overhead/REV calculations.
25	6/12/19	0.17	Mike	Hayes	Review email from Mick Lauter re: Overhead
26	6/12/19	0.17	Mike	Hayes	Email from Chris Peirce re: overhead.

27 P. REVIEW OF DEBTOR'S PLAN

28	Date	Hours	First Name	Last Name	Notes
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1	6/5/19	2.00	Mike	Hayes	Received and review Mick Lauter's brief re: exclusivity and Debtor's Plan
	6/5/19	0.17	Mike	Hayes	Email to Mick Lauter re: brief he prepared and circulated, making comments to the same.
2	6/7/19	0.50	Mike	Hayes	Draft email to Alan feld and Mick Lauter re: evidence needed to proceed on trial on insolvency.
3	6/17/19	2.00	Mike	Hayes	Review email from Mick Lauter re: Debtor's Plan and Disclosure Statement and review both.
4	6/18/19	0.50	Mike	Hayes	Email to Mick Lauter re: comments to Debtor's Plan.
	6/19/19	0.33	Mike	Hayes	Email from Mick Lauter re: DSI's spreadsheets as they relate to depos of Messrs. Parvin and Celebrezze.
5	6/19/19	0.17	Mike	Hayes	Review DSI's spreadsheets.
	6/19/19	0.33	Mike	Hayes	Review of email from Mick Lauter re: Debtor's models.
6	6/19/19	0.17	Mike	Hayes	Review of email from Chris Peirce re: Debtor's model and reply to the same.
	7/18/19	1.00	Mike	Hayes	Status call with Mick Lauter re: plan and status of case.
7	7/18/19	0.83	Mike	Hayes	Review email from a Kelly Kinnon re: landlord claims.

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EXHIBIT B**COSTS**

DATE	PERSON	VENDOR	TYPE	AMOUNT	NOTES
3/10/19	Mike Hayes	SWA	Airfare	\$157.00	MSP-SFO
3/10/19	Mike Hayes	Aloft Hotel	Hotel	\$135.26	Hotel in San Francisco
3/11/19	Mike Hayes	UAL	Airfare	\$168.47	SFO-ORD
3/11/19	Mike Hayes	UAL	WIFI	\$13.99	WIFI-write notes regarding settlement meeting
3/10/19	Jim Gansman	AA	Airfare	\$330.30	NY-SFO
3/10/19	Jim Gansman	Budget	Rental Car	\$64.73	Car Rental SF
3/10/19	Jim Gansman	Marriott	Hotel	\$170.10	SF Hotel
3/11/19	Jim Gansman	Delta	Airfare	\$163.30	SFO-NY
4/03/19	Jim Gansman	Court Call	Telecom	\$36.95	Attend court hearing
4/04/19	Jim Gansman	Court Call	Telecom	\$39.68	Attend court hearing
5/22/19	Jim Gansman	Delta/AA	Airfare	\$417.60	NY-LA-SFO
5/22/19	Jim Gansman	Delta	WIFI	\$16.00	Draft emails re: mediation
5/23/19	Jim Gansman	Delta	Airfare	\$434.30	SFO-NY
5/23/19	Jim Gansman	Palace Hotel	Hotel	\$454.36	Hotel in SF, mediation
5/23/19	Jim Gansman	VIA	Car Service	\$62.88	Transportation from NY to Home, over 1 hour
Total				\$2,664.92	

August 15, 2019

DELIVERED VIA EMAIL

Kelly Kinnon
Committee Chairperson
Official Committee of Unsecured Creditors
of Sedgwick LLP
Kelly.Kinnon@barings.com

Re: In re Sedgwick LLP, Case No. 18-31087

Dear Kelly:

We enclose a copy of our second interim fee application (the "Application") for allowance of compensation and reimbursement of expenses incurred as counsel to the Official Committee of Unsecured Creditors of Sedgwick LLP, and my declaration in support of the Application.

The court's Guidelines for Compensation and Expense Reimbursement of Professionals and Trustees provide that a debtor in possession, a trustee or an official committee must exercise reasonable business judgment in monitoring the fees and expenses of the estate's professionals. We invite you to discuss any objections, concerns or questions you may have with us. The Office of the United States Trustee will also accept your comments. The court will also consider timely filed objections by any party in interest at the time of the hearing.

If you have no objections to the Application please indicate so by signing in the space below and returning a copy of this letter to my attention. Should you have any questions, objections or other concerns regarding the Application, please do not hesitate to contact our office.

The total of our fees through July 31, 2019 is now \$241,963.89 against our cap of \$245,000. In August, we have exceeded the cap.

Also, this letter was modeled after the same one Mick Lauter used for his firm.

Very truly yours,


Michael Hayes

Commenda Asset Resolution Partners

Enclosures

NO OBJECTION

By: _____

Kelly Kinnon
Chair
for the Official Committee
of Unsecured Creditors of
Sedgwick LLP

Dated: _____, 2019

SMRH:4822-7175-6701.1